

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Timothy A. Stewart  
Gretchen W. Stewart

Debtor(s)

Timothy A. Stewart  
Gretchen W. Stewart

Movants

v.

Freedom Mortgage Corporation  
Ronda J. Winnecour, Trustee

Respondents

BK. NO. 15-23443 CMB

CHAPTER 13

Related to Document No. 80, 83 , 88

**CONSENT ORDER**

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the follow Consent Order:

WHEREAS, Movants filed a Motion to Enforce Trustee's Report of Receipts and Disbursements, Notice of Final Cure Payment, and Discharge Order along with Request for Payment of Legal Fees and Expenses on April 19, 2021 (Doc. 80);

WHEREAS, Respondent filed a response on May 6, 2021 (Doc. 83);

WHEREAS, a hearing is scheduled for May 25, 2021 at 1:30 p.m;

WHEREAS, the parties have discussed this matter in depth and hereby enter into this Consent Order to resolve the Motion to Enforce.

AND NOW, it is hereby stipulated by and between the undersigned as follows:

1. Debtors were contractually due for 12/1/2020 as of 11/15/2020.
2. Debtors are contractually due for the 7/1/2021 payment as of 6/15/2021.
3. Within 14 days of this consent order, Respondent will provide the Debtor's with a corrected loan history.
4. Respondent will remove all late fees.

5. Respondent and debtor will look at the escrow disbursements made for 2020 to present to ensure they accurate.

6. Within 30 days of this Consent Order, Respondent agrees to submit a Uniform Data Form to any credit bureau that it has reported on the subject loan to correct any entries indicating that the loan was delinquent.

7. Respondent shall pay counsel fees in the amount of \$1,500 within 14 days of receipt of an executed W-9.

Consented to by:

/s/ Christopher M. Frye

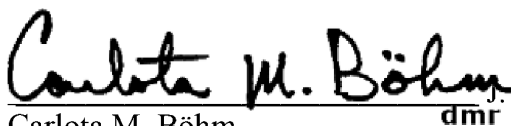
Christopher M. Frye, Esq., PA ID 208402  
Steidl & Steinberg  
Suite 2830-Gulf Tower, 707 Grant St.  
Pittsburgh, PA 15219  
Phone: (412) 391-8000  
Email: chris.frye@steidl-steinberg.com  
Dated: 6/21/2021

/s/ Brian C. Nicholas

Brian C. Nicholas, Esq., PA ID 317240  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: (201-549-5366)  
Email: bnicholas@kmlawgroup.com  
Dated: 6/21/2021

It is hereby ORDERED that the parties' Consent Order be and hereby is APPROVED.

By the Court,

  
dmr

Carlota M. Böhm  
Chief United States Bankruptcy Court Judge

Dated: June 21, 2021

FILED  
6/21/21 8:03 am  
CLERK  
U.S. BANKRUPTCY  
COURT - WDP

In re:  
Timothy A. Stewart  
Gretchen W. Stewart  
Debtors

Case No. 15-23443-CMB  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0315-2  
Date Rcvd: Jun 21, 2021

User: dric  
Form ID: pdf900

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jun 23, 2021:

Recip ID	Recipient Name and Address
db/jdb	+ Timothy A. Stewart, Gretchen W. Stewart, 237 Roscommon Place, McMurray, PA 15317-2447

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jun 23, 2021

Signature: /s/Joseph Speetjens

---

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on June 21, 2021 at the address(es) listed below:

Name	Email Address
Ann E. Swartz	on behalf of Creditor New York Community Bank ecfmail@mwclaw.com ecfmail@ecf.courtdrive.com
Brian Nicholas	on behalf of Creditor New York Community Bank bnicholas@kmlawgroup.com
Brian Nicholas	on behalf of Creditor FREEDOM MORTGAGE CORPORATION bnicholas@kmlawgroup.com
Brian Nicholas	on behalf of Creditor Freedom Mortgage Corporation bnicholas@kmlawgroup.com
Celine P. DerKrikorian	on behalf of Creditor New York Community Bank ecfmail@mwclaw.com
Christopher M. Frye	on behalf of Joint Debtor Gretchen W. Stewart chris.frye@steidl-steinberg.com

District/off: 0315-2

User: dric

Page 2 of 2

Date Rcvd: Jun 21, 2021

Form ID: pdf900

Total Noticed: 1

julie.steidl@steidl-steinberg.com;todd@steidl-steinberg.com;leslie.nebel@steidl-steinberg.com;cgoga@steidl-steinberg.com;r53037@notify.bestcase.com;rlager@steidl-steinberg.com;kmeyers@steidl-steinberg.com

Christopher M. Frye

on behalf of Debtor Timothy A. Stewart chris.frye@steidl-steinberg.com  
julie.steidl@steidl-steinberg.com;todd@steidl-steinberg.com;leslie.nebel@steidl-steinberg.com;cgoga@steidl-steinberg.com;r53037@notify.bestcase.com;rlager@steidl-steinberg.com;kmeyers@steidl-steinberg.com

Office of the United States Trustee

ustpregion03.pi.ecf@usdoj.gov

Rebecca Solarz

on behalf of Creditor FREEDOM MORTGAGE CORPORATION bkgroup@kmlawgroup.com

Ronda J. Winnecour

cmecf@chapter13trusteedpa.com

TOTAL: 10